

June 17, 2019

*Via ECFS*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: WC Docket No. 19-141**

Dear Ms. Dortch:

At the request of Commission staff, InterCarrier Networks, LLC (“ICN”) and Great Plains Communications LLC (“GP Communications,” and together with ICN, the “Applicants”), submit this letter to provide certain clarifying information with regard to the scope of the operations of ICN and the ownership of GP Communications.

First, ICN is authorized to provide competitive local exchange and exchange access services in Illinois, Indiana, and Kentucky. ICN currently provides intra- and interexchange private line and advanced services primarily to wholesale customers in Illinois and Indiana. ICN does not provide local switched services in any state and does not yet provide any services in Kentucky. ICN does not provide service as an incumbent local exchange carrier in any jurisdiction.

Second, Grain Management, LLC (“Grain Management”) manages and is affiliated with Grain Communications Opportunity Fund II, L.P. By this letter, the Joint Applicants supplement their application to note that Grain Management owns a controlling interest in WANRack, LLC (“WANRack”). WANRack is a competitive provider that builds private fiber networks for K-12 school districts. This ownership existed and was disclosed in connection with the transaction in which Great Plains Communications Holdings LLC acquired ownership of GP Communications.<sup>1</sup> As explained in the application and confirmed in this letter, there will be no new acquisition of an entity offering service as an ILEC as a result of this transaction, so there is no risk of ILEC overlap.

Third, no other entities in the ownership chain report a 10% or greater ownership interest in any telecommunications provider.

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<sup>1</sup> See Letter from Douglas D. Orvis II and Danielle Burt, Counsel to GPC, Inc. and Matthew S. DelNero and Thomas G. Parisi, Counsel to Great Plains Communications Holdings LLC, WC Docket No. 18-210; IB File No. ITC-T/C-20180703-00142 (filed July 26, 2018).

Finally, we confirm that no entities hold a 10% or greater interest in Board of Regents of The University of Texas System or The New York State Common Retirement Fund, and neither entity is controlled by a board or general partner.

Respectfully submitted,

**GREAT PLAINS COMMUNICATIONS LLC**

/s/

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/s/

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